

Mitchell A. Stephens (11775)
JAMES DODGE RUSSELL & STEPHENS, P.C.
10 W. Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: mstephens@jdrsllaw.com

James R. Marsh (Pro Hac Forthcoming)
Margaret E. Mabie (Pro Hac Forthcoming)
MARSH LAW FIRM PLLC
31 Hudson Yards, 11th Floor
New York, New York 10001
Telephone: (212)372-3030
Email: jamesmarsh@marsh.law
Email: margaretmabie@marsh.law

Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

“CASSEAOPEIA”, “JANE”, “ERIK”,
“TORI”, “JENNY”, “LILY”, “SARAH”,
CHRISTOPHER MARCHESE, conservator
for “SIERRA”, “JANE DOE” conservator for
“SAVANNAH” and “SKYLAR”, “JOHN
DOE” conservator for “SALLY”,
“MAUREEN,” “JANE ROE” next friend for
“PIA”, “MYA”, and “AVA”,

Plaintiffs,

vs.

BENJAMIN DEPUTY BROWN,

Defendant.

**DECLARATION OF JAMES R.
MASH IN SUPPORT OF MOTION TO
PROCEED WITH PSEUDONYMS**

Case No. 2:22-cv-00251

Magistrate Judge Daphne A. Oberg

DECLARATION OF JAMES R. MARSH
IN SUPPORT OF MOTION TO PROCEED WITH PSEUDONYMS

I, JAMES R. MARSH, declare under penalty of perjury that the following is true and correct:

I, along with Carol L. Hepburn, represent Plaintiffs Casseaopeia, Erika, Tori, and Jenny. I am making this declaration based upon my own personal knowledge and professional experience as an attorney in support of the Plaintiffs' motion to proceed using pseudonyms.

1. In 2005, I began representing victims of child pornography and online exploitation. I have represented such victims in both criminal and civil cases at all levels of the federal court system including the United States Supreme Court. I have also helped enact major law reform in Congress to enhance the ability of victims to obtain compensation in civil and criminal cases.

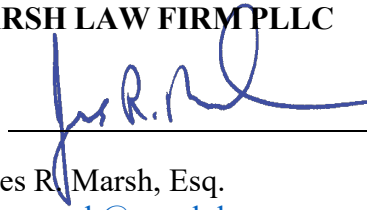
2. I have represented Plaintiffs Casseaopeia since 2016, Erika and Tori since 2016, and Jenny since 2016. I have represented Erika, Tori, and Jenny in both criminal and civil matters related to their victimization through child pornography. In each of these matters, a pseudonym has been used in order to protect their anonymity. No court has ordered that they proceed with their legal name in any court proceeding.

3. Casseaopeia, Erika, Tori, and Jenny request permission to use pseudonyms herein in order to protect them from harassment, injury, ridicule and personal embarrassment.

4. Casseaopeia, Erika, Tori and Jenny have suffered and continue to suffer from grievous psychological harm resulting from the child pornography related crimes of which they are victims. They suffer from anxiety, depression, post-traumatic stress disorder, and hyper-vigilance. They live in daily fear that someone will discover their identity and link them to the child sexual abuse images of them on the Internet. They believe, as do I, that exposing their legal names to the public will put them in significant physical and emotional danger.

Executed on 11th of April, 2022.

MARSH LAW FIRM PLLC

A handwritten signature in blue ink, appearing to read "James R. Marsh", is written over a horizontal line.

James R. Marsh, Esq.
jamesmarsh@marsh.law
31 Hudson Yards, 11th Fl.
New York, NY 10001
Telephone: 212-372-3030